

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
:
UNITED STATES OF AMERICA :
:
-v- :
:
ALBERT HAFT, :
:
Defendant. :
- - - - - x

~~CONFIDENTIAL~~ SUPERSEDING
INFORMATION

S1 22 Cr. 19 (PGG)

COUNT ONE
(Conspiracy to Defraud the United States)

The United States Attorney charges:

1. From at least in or about 2014 through at least in or about 2020, in the Southern District of New York and elsewhere, ALBERT HAFT, the defendant, together with others known and unknown, willfully and knowingly did conspire, combine, confederate, and agree together and with each other to defraud the United States of America and an agency thereof, to wit, the Internal Revenue Service ("IRS").

2. It was a part and object of the conspiracy that ALBERT HAFT, the defendant, together with others known and unknown, willfully and knowingly would and did defraud the United States of America and the IRS for the purpose of impeding, impairing, obstructing, and defeating the lawful government functions of the IRS in the ascertainment, computation, assessment, and collection of revenue, to wit, HAFT conspired with others to defraud the

United States by preparing and submitting to the IRS on behalf of others fraudulent and materially false tax returns, in order to impede, impair, obstruct, and defeat the IRS's functions in the ascertainment, computation, assessment, and collection of federal income taxes.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal objects thereof, ALBERT HAFT, the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. Between at least in or about 2014 through at least in or about 2020, HAFT filed materially false tax returns for clients living in and maintaining bank accounts in the Southern District of New York and elsewhere.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Conspiracy to Defraud the United States)

The United States Attorney charges:

4. From in or about 1990 through at least in or about 2021, in the Southern District of New York and elsewhere, ALBERT HAFT, the defendant, together with others known and unknown, willfully and knowingly did conspire, combine, confederate, and agree together and with each other to defraud the United States of America and an agency thereof, to wit, the Internal Revenue Service

("IRS").

5. It was a part and object of the conspiracy that ALBERT HAFT, the defendant, together with others known and unknown, willfully and knowingly would and did defraud the United States of America and the IRS for the purpose of impeding, impairing, obstructing, and defeating the lawful government functions of the IRS in the ascertainment, computation, assessment, and collection of revenue, to wit, HAFT conspired with others to defraud the United States by preparing and submitting to the IRS on behalf of others fraudulent and materially false tax returns, in order to impede, impair, obstruct, and defeat the IRS's functions in the ascertainment, computation, assessment, and collection of federal income taxes.

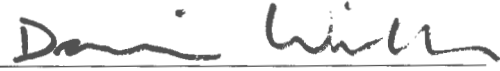
Overt Acts

6. In furtherance of the conspiracy and to effect the illegal objects thereof, ALBERT HAFT, the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. Between in or about 1990 through in or about 2021, HAFT misclassified personal expenses as business expenses on tax returns for clients living in and maintaining bank accounts in

the Southern District of New York and elsewhere.

(Title 18, United States Code, Section 371.)

A handwritten signature in black ink, appearing to read "Damian Williams", written over a horizontal line.

DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ALBERT HAFT,

Defendant.

SEALED SUPERSEDING
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(18 U.S.C. § 371)

DAMIAN WILLIAMS
United States Attorney
